

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: July 25, 2002/ 3:05 PM

Site Contact(s): Richard Lesser
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Regulatory Contact: James Hindman
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Agency: CDPHE

Purpose of Contact: FBI Pilot and PCBs

Discussion

As discussed, this contact record documents recent discussions regarding characterization of the FBI Pilot incinerator, Room 135, Building 776, at Rocky Flats. Characterization requirements imposed by RCRA were previously approved by CDPHE in a RCRA closure plan. The recent discussions focused on the characterization of the unit and its residues as required under TSCA.

This unit was used in a trial burn for PCB destruction efficiency in the early 1980s. In compliance with all applicable Rocky Flats' procedures and requirements, this unit will be dismantled and packaged for shipment and off-site disposal. The unit itself (pipes, combustion chamber, exhaust ducts, etc.) will be characterized as a drained PCB item, amenable for landfill disposal at the Envirocare facility in Utah. The unit will be drained of all free liquids and meet the receiving facility's acceptance criteria. The drained liquids will be characterized as liquids used to flush a unit that originally held more than 500 ppm PCBs. These liquids will be prepped for disposal by incineration at a permitted and licensed RCRA / TSCA / RAD incinerator. The ash and catalyst within the unit will be removed for separate packaging, and characterized as solids with PCBs less than the applicable RCRA LDR. This material is also amenable for treatment and landfill disposal at Envirocare.

Thank you for discussing the matter with Region VIII TSCA.

Contact Record Prepared By: Richard Lesser

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